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State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Barbara J. Sabol, Secretary

Forbes Field
Topeka, Kansas 66620
913-862-9360



August 16, 1983

Mr. Mark W. Pelley
Environmental Affairs Specialist
Olin Chemicals Group
120 Long Ridge Road
Stamford, Connecticut 06494

Dear Mr. Pelley:

The Kansas Department of Health and Environment is currently reviewing your application for a hazardous waste storage permit for your facility located at 3155 Fiberglass Road in Kansas City, Kansas, EPA ID. No. KSD000203638. As a part of the permitting process Kansas Statute KSA 65-3437(c) requires that the Secretary of the Kansas Department of Health and Environment conduct a background investigation of the applicant. The financial, technical and management capabilities of the applicant must be considered before a permit is issued. Our department may reject a permit application if we judge that the applicant has a history of repeated violations of federal or state law and is an unsuitable operator.

In order to meet this statutory requirement we notified all appropriate state and federal agencies that your firm was seeking a hazardous waste storage permit for the above facility. We requested that they provide any information which would assist us in our review of your permit application.

The Maryland Department of Health and Mental Hygiene and the Texas Department of Water Resources both submitted comments pertaining to Olin Corporation facilities within their jurisdictions which have been involved in enforcement action pertaining to violations of hazardous waste rules and regulations. A copy of these two letters is enclosed for your review.

Based on this information the Department must now decide whether to proceed with the permitting process or deny the permit based on this information. In order to complete our administrative review of this issue, we are notifying you that the Department will accept any comments or information which you feel we should consider in making this decision. You should submit any written response no later than 30 days after the date of this letter.

EPA-ARWM/PMTS

AUG 18 1983

Region VII K.C., MO



R00011085
RCRA Records Center

Mr. Mark W. Pelley

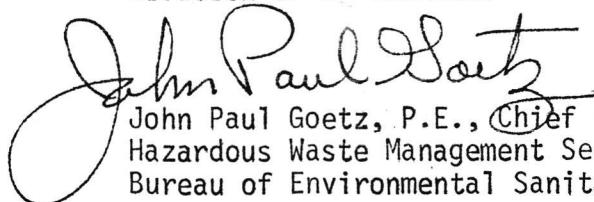
Page 2

August 16, 1983

If you have any questions concerning this matter please call me immediately.

Sincerely,

DIVISION OF ENVIRONMENT

A handwritten signature in cursive script, reading "John Paul Goetz". The signature is written in dark ink and is positioned above the printed name and title.

John Paul Goetz, P.E., Chief
Hazardous Waste Management Section
Bureau of Environmental Sanitation

JPG:kaa

cc: Karen Flournoy
Randy Bradley
Wilbur Bradley

TEXAS DEPARTMENT OF WATER RESOURCES

1700 N. Congress Avenue
Austin, Texas

TEXAS WATER DEVELOPMENT BOARD

Louis A. Beecherl, Jr., Chairman
George W. McCleskey, Vice Chairman
Glen E. Roney
W. O. Bankston
Lonnie A. "Bo" Pilgrim
Louie Welch

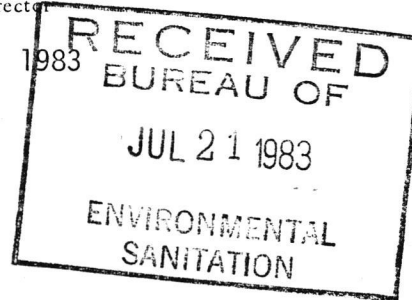


Charles E. Nemir
Executive Director

TEXAS WATER COMMISSION

Felix McDonald, Chairman
Lee B. M. Biggart
John D. Stover

July 15, 1983



Mr. Vivek Kamath
Hazardous Waste Management Section
Bureau of Environmental Sanitation
Department of Health and Environment
Forbes Field
Topeka, Kansas 66620

Dear Mr. Kamath:

Re: Prospective Permittees in the State of Kansas

We have received your letter of June 8, 1983 and regret the delay in our response. Of the corporations you have listed as prospective permittees, the State of Texas has found the Olin Corporation, Chemicals Group, in Beaumont, Texas, TXD008097487, significantly noncompliant with our solid waste regulations. Olin is presently under enforcement action with the State for ground water contamination and inadequate management of their RCRA facility.

If you have any further questions concerning this matter, please contact Marie Murphy at (512)475-5516.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary D. Schroeder".

Gary D. Schroeder, P.E., Chief
Solid Waste and Spill Response
Enforcement and Field Operations

GDS/jp

cc: Texas Department of Water Resources District 6 Office
Savannah Robinson
Jay Snow
Chip Volz

State of



Maryland

OFFICE OF ENVIRONMENTAL PROGRAMS
DEPARTMENT OF HEALTH AND MENTAL HYGIENE

201 WEST PRESTON STREET

BALTIMORE, MARYLAND 21201

Area Code 301

3833123

TTY FOR DEAF: Balto. 383-7555

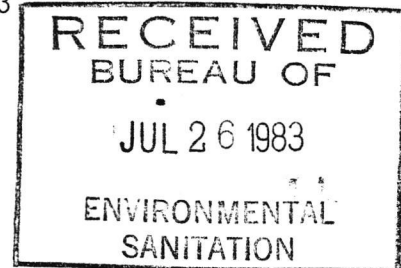
D.C. Metro. 565-0451

Charles R. Buck, Jr., Sc.D. Secretary

William M. Eichbaum, Assistant Secretary

July 20, 1983

Vivek Kamath
Hazardous Waste Management Section
Bureau of Environmental Sanitation
State of Kansas
Forbes Field
Topeka, Kansas 66620



Dear Mr. Kamath:

We are in receipt of your letter of June 8, 1983 relative to information regarding 11 companies which are involved in the permitting process in the State of Kansas. As requested, we have reviewed our files in an attempt to supply pertinent information which might be of use to you.

Our review indicates that we have instituted action against only one of the eleven companies listed. On December 6, 7, 8, 9, 1981, Olin Chemical Corporation, located at 5501 Pennington Avenue, Baltimore, Maryland 21226 was cited for shipping a CHS without a manifest. In order to eliminate further explanation, we have enclosed a copy of the incident for your use.

If I can be of any further assistance, or if you should have further questions, please contact Mr. John Koontz, Administrator, Enforcement Program at (301) 383-6650.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ronald Nelson".

Ronald Nelson, Director
Waste Management Administration

RN:d1

Enclosure

cc: Mr. Arthur Caple

State of Maryland

OFFICE OF THE SECRETARY

DEPARTMENT OF HEALTH AND MENTAL HYGIENE

201 WEST PRESTON STREET

MARYLAND 21201

Area Code 301

383-7328

Harry Hughes, Governor

Charles R. Buck, Jr., Sc.D. Secretary

March 12, 1982

CERTIFIED MAIL

Olin Corporation
C/O Corporation Trust Incorporated
25 South Charles Street
Baltimore, Maryland 21202

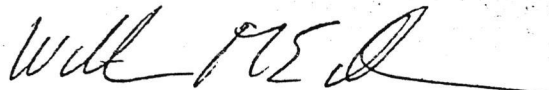
Gentlemen:

Enclosed you will find a Complaint and Requirement to Appear for an Administrative Hearing concerning violations of the Natural Resources Article. The cited violations resulted from transportation of hazardous waste from your facility by an uncertified hauler.

As you can see by the Complaint and Requirement to Appear, you have the option of pre-paying the civil penalty in the amount of \$1000.00. If you choose to appear for the Hearing, the assessment and amount of the civil penalty will be determined by the Hearing Officer.

If you should have any questions concerning this matter, please communicate with Mr. Paul G. Thompson, Acting Regional Chief, Waste Management Administration at 383-6650.

Sincerely yours,



William M. Eichbaum
Assistant Secretary for
Environmental Programs

WME/lch

Enclosure

cc: See Attached Page

Olin Corporation
Page Two

cc: Mr. Ronald Nelson
Dr. Donald J. Roop
Mr. Bernie Bigham
Mr. William O. Jensen, Jr.
Mr. Doug John
Mr. Fred Sachs
Mr. James J. Lyko

IN THE MATTER OF:

Olin Corporation

SERVE ON:

Corporation Trust Incorporated
25 South Charles Street
Baltimore, Maryland 21202

* SECRETARY OF HEALTH AND MENTAL
HYGIENE

*

* OFFICE OF ENVIRONMENTAL PROGRAMS
201 West Preston Street
Baltimore, Maryland 21201

*

C-0-82-135

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COMPLAINT AND REQUIREMENT TO APPEAR

Whereas, the State of Maryland, Department of Health and Mental Hygiene, Office of Environmental Programs, pursuant to the powers, duties and responsibilities vested in and imposed upon the Secretary of Health and Mental Hygiene, by the provision of Natural Resources Article, Section 8-1401 through 8-1417, inclusive, Annotated Code of Maryland, has upon investigation determined that Olin Corporation has failed to provide a Hazardous Waste Manifest to a certified hazardous waste hauler for hazardous waste generated at your facility located at 5501 Pennington Avenue, Baltimore, Maryland.

Whereas, on December 6, 7, 8 and 9, 1981, seventeen (17) bulk containers of acid sludge, a corrosive hazardous waste, were transported from your

1. Appear at a Civil Penalty Hearing scheduled by the Administration for 9:30 on April 27, 1982, in the Third Floor Conference Room, Department of Health and Mental Hygiene, 201 West Preston Street, Baltimore, Maryland 21201, to be held before a Hearing Officer of the Department of Health and Mental Hygiene, Office of Hearings, hereby designated to assess the civil penalty this case. This Hearing is being held under the authority of Natural Resources Article, Sections 8-1412(a)(3) and 8-1416(d), Annotated Code of Maryland. Your appearance before the Department under the authority of Section 8-1412(a)(3) constitute an Administrative Hearing and you have the right of any party in a contested case provided by Sections 251 and 252 of Article 41, Annotated Code of Maryland.
2. In lieu of appearing, pre-pay a civil penalty to the Office of Environmental Programs in the amount of \$1000.00. By doing so, Olin Corporation waives its right to a Hearing and its opportunity to contest the assessment of the penalty. If pre-payment of the civil penalty is elected, Olin Corporation shall submit a Certified